

OBJECTION TO PLANNING APPLICATION PL/2024/05435 - REDCLIFFE HOMES, HOLT

Holt Parish Council strongly object to the recommendations made by the Highways Officer regarding Planning Application PL/2024/05435 for the proposed 55 dwellings north of Melksham Road (B3107), Holt. This was discussed at our meeting on 20th February 2025.

Despite repeated requests for a site visit, the Highways Officer has refused our request and has not responded to emails, instead opting to submit comments directly on the application portal. This lack of engagement is disappointing, especially as we have provided detailed local evidence of serious highway safety concerns that remain unaddressed. We strongly disagree with the Highways Officer's recommendations based on our first-hand knowledge of the existing road safety issues, which will only be exacerbated by this outline planning application. Furthermore, the Chair of Holt Parish Council recently attended an online planning webinar where the importance of meaningful engagement and listening to Parish Councils was emphasized as a fundamental part of the planning process. It is concerning that despite this clear expectation, some of our comments, our requests for direct engagement and a site visit have been disregarded in this case.

The inconsistencies in the Highways Officer's responses raises questions with the robustness of decisions. The initial recommendations provided at the pre-application stage clearly recognised the risks posed by this development, but these concerns have since been abandoned without any material change in road conditions. This lack of consistency raises serious concerns about the decision-making process. It is imperative that planning decisions remain transparent and rooted in evidence-based safety assessments.

At the pre-application stage, the Highways Officer (Kerry Flower) explicitly raised serious concerns regarding access and pedestrian safety on the B3107. The officer's response (WC-22-09-245491, dated 26/09/2022) included the following key points:

"With regards to the crossing of the main carriageway, the traffic speeds prohibit the application of a zebra crossing and the proposed refuge island is too narrow to accommodate cyclists. In order to overcome these issues, it is therefore proposed to research the potential of delivering a toucan crossing which would have the duplicate effect of providing a significant gateway feature to the village."

"Holt is poorly served by active travel infrastructure and the development proposals make scant provision to improve this."

"In order to overcome the deficiencies of walking and cycling infrastructure, it is proposed to provide an appropriate LTN 1/20 compliant link within the development site on the northern side of the road, crossing the main carriageway in a form that accommodates both pedestrians and cyclists and with a cycle transition to the carriageway of Great Parks, which will operate as a quiet road network."

The officer recognised that a controlled crossing was essential for pedestrian and cyclist safety, directly contradicting the later decision to remove this feature. The applicant complied with the officer's remarks and submitted plans for a Toucan crossing at their expense.

Highways Officer's Comments on Outline Planning (August 2024)

By the time the outline application was submitted, the same Highways Officer had reversed their stance, contradicting their previous recommendations (WC-24-08-309121, dated 13/08/2024):

"The amount of pedestrian movements across the road does not justify the need for a toucan crossing; therefore, this shall be omitted from the plan."

"It is considered that there would be a benefit to extend the 30mph speed limit."

"No additional traffic calming measures are required."

Despite the officer's initial recognition of serious safety risks, these mitigation measures were inexplicably removed, leaving pedestrians, particularly schoolchildren, without a safe well-lit means of crossing the B3107 to access secondary school buses, and public buses to school as well as the pre-school and primary aged children to walk to their local village school site.

Second Outline Planning Comment (February 2025)

The same Highways Officer once again further downplayed pedestrian safety concerns in a later response (WC-25-02-325631, dated 18/02/2025):

"The proposed reduction of the speed limit to 30mph is subject to a Traffic Regulation Order (TRO), which follows an independent consultation process and cannot be guaranteed. However, should the TRO fail, the Local Highways Authority is satisfied that existing recorded speeds, with additional infrastructure provisions (entry gates, reminders, etc.), can be maintained and hence can be accommodated by the required sight stopping distance."

"The amount of pedestrian movements across the road is not considered sufficient to justify the need for a light-controlled crossing; therefore, this shall be omitted from the plan."

"With regard to the request by the Parish Council that a mini roundabout be considered for the access. This has been considered extensively throughout this application process... A mini roundabout would not therefore fulfil the Parish Council's intended purpose of creating a useful and well-designed traffic calming feature at the entrance to the village but further is inappropriate and counterproductive in highway safety terms."

The officer's response fails to acknowledge that a light-controlled crossing was previously recommended for safety reasons. The refusal to implement even basic pedestrian protections disregards the earlier recognition of active travel deficiencies in Holt and puts new residents at significant risk.

This shift in position contradicts earlier safety concerns and fails to ensure pedestrian and road user safety, directly conflicting with the requirements of the National Planning Policy Framework (NPPF) (December 2024) and the Wiltshire Core Strategy.

- **NPPF Paragraph 110(d)** states that developments should provide "safe and suitable access for all users."
- **NPPF Paragraph 112** emphasises the prioritisation of pedestrian and cycle movements within development proposals.
- **Wiltshire Core Strategy Core Policy 60 (Sustainable Transport) and Core Policy 61 (Transport and Development) Core Policy 62 (Development Impacts on the Transport Network)**, mandate that new development must mitigate its impact on the local transport network.
- **Core Policy 57 (Ensuring High-Quality Design and Place Shaping)** requires developments to create safe, accessible, and inclusive environments that reduce conflicts between vehicles, pedestrians, and cyclists.

Despite these clear policy requirements, the Highways Officer's revised stance ignores the fundamental need for pedestrian safety improvements and contradicts prior commitments made during pre-application discussions.

Holt Parish Council has made repeated efforts to engage with the Highways Officer and Wiltshire Council and other stakeholders to highlight the severe safety concerns associated with this application in addition to our online objection to PL/2024/05435. Despite these efforts, no meaningful action has been taken to address our concerns:

- August 2024: Parish representatives met on-site with Kirsty Rose (Local Highways and Footpath Improvement Group - LHFIG) and Cllr Trevor Carbin.
- October 2024: The Parish Council met with MP Brian Matthew, who shared concerns about road safety and access issues and subsequently wrote to Wiltshire Council Cabinet urging them to reconsider the highways response and consider joined up thinking with the 2 planning applications.
- November 2024: A detailed meeting was held with Wiltshire Council Planning Officers and Highways Representative Julie Cleave, during which these issues were again raised. However, despite this engagement, no significant changes were made to the application to improve road safety or mitigate the impact of increased traffic.

These discussions demonstrate that the Parish Council has actively sought solutions to ensure that should this development be approved it will not create further safety risks, yet our concerns have been ignored. The refusal of the Highways Officer to engage with Holt Parish Council contradicts the principles of public consultation outlined in the NPPF (Paragraph 39) and Wiltshire Council's commitment to community engagement. Ignoring local expertise and lived experience is not only dismissive but potentially inconsistent with public consultation obligations. Proper consultation is essential for ensuring that decisions are made with full awareness of local conditions and risks.

This development of 55 new homes comes at a time when no-one knows the full real time effect of the 90-home development on the opposite side of the road. The cumulative impact of both developments, 145 new homes in total, has not been properly assessed, nor have adequate highway improvements been proposed to ensure the safety of new and existing residents. If pedestrian infrastructure improvements were deemed necessary for the Gladman/Bewley Homes site, it is inconsistent and unreasonable for similar measures not to be required for this development, given the comparable scale and impact.

Holt Parish Council put forward suggestions to improve sustainable travel to key village amenities, but WC has not sufficiently engaged with HPC and told them it would be seen as an inducement. The Transport Statement submitted by Redcliffe Homes with their outline planning application does not account for the poor condition of existing footways leading to key village amenities, including the primary school, shop, and bus stops. The narrow and uneven pavements force pedestrians, including schoolchildren, onto the road in places, further increasing risks. The parking refuge plans for The Common which were included in Holt Parish Council's previous consultation responses have been disregarded. These measures were designed to manage traffic flow and prevent congestion in the heart of the village, ensuring safer pedestrian movement, access to the Pre-School and Primary School and better parking availability. By failing to integrate these necessary infrastructure improvements, the proposal does not meet the requirements for sustainable transport outlined in Core Policies 60 and 61 of the Wiltshire Core Strategy.

Fundamentally, the entrance to Holt via the B3107 must be more carefully considered, with essential traffic calming measures introduced to:

- Enable safe, sustainable travel for new residents.
- Provide safe and convenient access to village amenities, particularly for pedestrians and cyclists.
- Ensure the speed of vehicles entering and exiting the village is properly controlled.

The B3107 Melksham Road is known for excessive vehicle speeds and limited safe crossing points. Despite this, the only proposed highway adjustment is a possible minor extension of the 30mph speed limit, which, in our opinion, is wholly inadequate. Moving the speed limit alone will not guarantee compliance, as vehicles frequently fail to slow down even when approaching built-up areas. Without proper traffic-calming measures, such as speed cushions, chicanes, or electronic speed signage, the risk of speeding and accidents will remain high.

We have requested effective measures to ensure speed reduction, including:

- Traffic islands and refuges to slow traffic and provide safer pedestrian crossing points.
- Speed cushions to ensure compliance with speed limits.
- Entry gateway features to visually and physically alert drivers they are entering a residential area.
- Electronic speed monitoring signs to enforce speed limits in real-time.

Residents have also expressed serious concerns about the increased dangers posed by this development, particularly regarding speeding vehicles, inadequate traffic calming, and the lack of safe pedestrian crossings. Of the online comments submitted by residents, a considerable proportion referenced traffic-related concerns, with more than 40 specifically mentioning issues with speeding, road safety, and the urgent need for a controlled crossing. The overwhelming response from the community highlights that road safety is a paramount issue that must be addressed before any development proceeds.

Traffic Speed and Calming Issues

- *“The B3107 is already dangerous, with vehicles regularly exceeding 50mph as they enter the village. Without proper speed reduction measures, this development will make the situation worse.”* – WC-24-07-305005
- *“If Holt is to be forced to take this development, then traffic calming must be a priority. A mini roundabout at the entrance to the new site would at least slow down vehicles before they enter the village.”* – WC-24-07-306919

Dangerous Road Crossing Conditions

- *“Crossing the B3107 is already difficult and dangerous, particularly for school children and elderly residents. The fact that a controlled crossing has not been included in this development is unacceptable.”* – WC-24-07-306994
- *“There is no safe pedestrian route from this development into the village. The pavement is narrow and poorly maintained, and cars regularly speed through the area.”* – WC-24-07-307061
- *“Residents will be forced to drive because walking is not a viable option with the current lack of crossings and pedestrian infrastructure.”* – WC-24-07-307030

These local concerns directly contradict the Highways Officer's position and demonstrate that proper traffic mitigation measures are urgently needed before any development is approved.

Given the significant highway safety concerns, lack of infrastructure improvements, and failure to integrate meaningful road safety measures, this application should not be approved in its current form. We strongly urge Wiltshire Council to reject the Highways Officer's recommendations and instead prioritise a comprehensive, evidence-based review of road safety impacts, including the provision of robust traffic calming measures.

Holt Parish Council request:

1. Mandate a site visit with Highways, Wiltshire Council planning officers, and community representatives to assess real-world safety concerns before making a final decision.
2. Incorporate robust traffic-calming measures on the B3107, including speed cushions, chicanes, and physical road narrowing.
3. Enhance signage and electronic speed monitoring to ensure speed limit compliance.
4. Require a controlled pedestrian crossing at the key movement point across Melksham Road.
5. Integrate necessary walking and parking infrastructure improvements to Holt's existing facilities, including The Common parking refuge, crossing points and footway upgrades.
6. Ensure consistency in planning decisions by applying the same pedestrian safety measures required for the Bewley Homes development to this proposal.
7. S106 contributions totalling £60,000 for improvements to walking routes on the B3107 as a minimum to be proportionate with the accepted s106 provision at the site opposite (PL/2022/03315).

A failure to address these urgent concerns would compromise pedestrian safety and indicate that Wiltshire Council is willing to override its own policies and safety standards to approve this development. We strongly urge immediate corrective action before this application proceeds further.